

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NIKE, INC.,

Plaintiff,

v.

GLOBAL HEARTBREAK LLC and NAADIER
RILES,

Defendants.

Case No. 3:24-CV-00476-MAS-RLS

NOTICE OF MOTION FOR DEFAULT JUDGMENT

TO THE CLERK OF THE COURT:

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 55(b)(2), Plaintiff Nike, Inc. (“Nike”) will move this Court on Monday, May 20, 2024 for default judgment against Defendants Global Heartbreak LLC and Naadier Riles (collectively, “Global Heartbreak”). In support of its Motion, Nike relies on its accompanying Brief and declaration of Bridgette C. Gershoni.

Dated: April 17, 2024

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Aaron Stiefel

Christopher J. Renk (*pro hac vice* to be filed)
Chris.Renk@arnoldporter.com
Michael J. Harris (*pro hac vice* to be filed)
Michael.Harris@arnoldporter.com
ARNOLD & PORTER KAYE SCHOLER LLP
70 West Madison Street, Suite 4200
Chicago, Illinois 60602-4231
Telephone: (312) 583-2300

Bridgette C. Gershoni (*pro hac vice* to be filed)
Bridgette.Gershoni@arnoldporter.com
Michael J. Gershoni (*pro hac vice* to be filed)
Michael.Gershoni@arnoldporter.com
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Ave. NW
Washington, DC 20001
Telephone: (202) 942-6745

Aaron Stiefel (NJ ID # 013531981)
Aaron.Stiefel@arnoldporter.com

ARNOLD & PORTER KAYE SCHOLER LLP
250 West 55th Street
New York, NY 10019-9710
Telephone: (212) 836-8442

Attorneys for Plaintiff Nike, Inc.

CERTIFICATE OF SERVICE

I certify that on April 17, 2024, copies of **PLAINTIFF NIKE, INC.’S NOTICE OF MOTION FOR DEFAULT JUDGMENT, BRIEF IN SUPPORT OF THE MOTION, AND DECLARATION OF BRIDGETTE C. GERSHONI** were filed with the Clerk of the Court using the CM.ECF system, which will send notification of such filing to all counsel of record.

/s/ Aaron Stiefel

Aaron Stiefel